

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LISA KREINBRINK,)	
)	
Plaintiff,)	No. 08-3482
)	
vs.)	Judge Virginia Kendall
)	
TASC, INC., an Illinois non-for-profit)	
Corporation, and JANELLE PRUTTER)	JURY DEMAND
)	
Defendants.)	

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff, Lisa Kreinbrink, by and through her attorneys, KULWIN, MASCIOPINTO & KULWIN, L.L.P., respectfully requests that this Court grant Plaintiff an extension of time until **September 22, 2008** to file her brief in response to Defendant Janelle Prueter's motion to dismiss in this matter.

1. By prior court order, Plaintiff's brief in response to Defendant's motion to dismiss is due by September 8, 2008. Plaintiff respectfully requests until **September 22, 2008** to file her brief in response to Defendant's motion to dismiss in this matter.

2. This is Plaintiff's first request to extend the time to file her response to Defendant's motion to dismiss. Plaintiff's counsel has conferred with Defendant's counsel regarding this motion. Defendant's counsel has no objection to this motion.

3. Due to the press of other matters and not for purposes of delay, Plaintiff needs additional time to file her response brief. Plaintiff seeks an extension of time for the following reasons:

- (A) Plaintiff's counsel with primary responsibility for finalizing and filing Plaintiff's response was away on a previously planned family vacation from August 22, 2008 through September 2, 2008.
- (B) Plaintiff's counsel has been preparing a response to a dismissal motion on behalf of fourteen plaintiffs, each of whom is asserting a variety of claims, in a preliminary injunction matter captioned *NKJ, LLC, et al. v. 401 North Wabash Venture LLC, et al.*, No. 08 CH 2902, which is currently pending before Judge Dorothy Kirie Kinnaird in the Circuit Court of Cook County, Chancery Division. The response in this matter is currently due on September 8, 2008.

4. As a result, it will not be possible to file Plaintiff's brief in response to Defendant's motion to dismiss by September 8, 2008. Accordingly, Plaintiff respectfully seeks additional time, up to and including **September 22, 2008**, to file her response brief.

5. The brief extension requested herein will not unduly delay these proceedings and no party will be prejudiced by the relief requested herein. The interest of justice warrants granting this motion.

WHEREFORE, Plaintiff Lisa Kreinbrink respectfully requests that this Court grant this motion for an extension of time and allow Plaintiff until **September 22, 2008** to file her brief in response to Defendant's motion to dismiss.

Respectfully submitted,

/s/ Jeffrey R. Kulwin

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